

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

ALBERTO ALATORRE,	)	
	)	
Plaintiff,	)	Civil Action No. 3:08-cv-215-WKW
	)	
vs.	)	
	)	
MACTEC, INC.	)	
	)	
Defendant.	)	

**CONSENT MOTION FOR TIME FOR DEFENDANT**  
**TO ANSWER COMPLAINT**

Defendant MACTEC, Inc. herein respectfully requests that this Court allow it until June 16, 2008 to answer Plaintiff's Complaint. In support of this motion, Defendant states:

1. Defendant's counsel only very recently became aware of this action and upon review of the Complaint determined that investigation was necessary in order to file a responsive pleading. Defendant's counsel is endeavoring now to arrange for the necessary investigation and conferences with Defendant in order to file an answer on behalf of Defendant, and will have gained sufficient information to allow an answer to be filed not later than June 16, 2008.

2. Defendants' counsel conferred with Plaintiff's counsel, Mr. Roderick Cooks, who consented on behalf of Plaintiff to this motion and agreed to allow MACTEC to answer the Complaint not later than June 16, 2008.

3. This motion is not presented for purposes of delay or any other improper purpose. Defendant has not previously sought any extension of time in this matter.

Defendant MACTEC, Inc. respectfully requests that this honorable Court grant this Consent Motion for Time for Defendant to Answer Plaintiff's Complaint.

Respectfully submitted this 10<sup>th</sup> day of June, 2008.

/s/ Michael B. Beers

**MICHAEL B. BEERS [BEERM4992]**  
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Counsel for Defendant MACTEC, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on JUNE 10, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. A true and correct copy of the foregoing has also been served upon all parties to this action by depositing a copy of same in the U.S. Mail, postage prepaid, addressed as follows:

Roderick T. Cooks, Esq.  
rcooks@winstoncooks.com  
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319 Seventeenth Street North  
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Counsel for Plaintiffs

on this the 10<sup>th</sup> day of June, 2008.

/s/ Michael B. Beers  
Of Counsel